BASIS OF DECISION
FOR NON-CLEAN UST CLOSURE
City Shops
City of Toppenish
Toppenish, Washington
EPA UST Facility #4-260015

I. General

This facility is located on the Yakama Indian Reservation within the City of Toppenish. It is owned and operated by the City.

II. Chronology of Events

- 11/3/93 Notice of Intent to close tanks
- 3/30-31/94 Tanks removed
- 4/5/94 EPA notified of contamination
- 4/12-13/94 Test pits constructed and sampled
- 7/20/94 Remediation activity took place
- 7/28/94 Consultant advises to close excavation
- 10/3/96 Landfarmed soils sampled
- 10/16/96 Data on soil samples reported to City

III. Review of Release Information

A water sample collected from the excavation during the March 1994 tank removal was found to have approximately 2,400 ppm (or mg/l) WTPH-Diesel. The tanks were reported to be sound, and it was speculated that contamination came from leaks in piping between the tanks and pump island, or from spillage.

In April 1994 four test pits, surrounding the area of contamination, were dug to a depth of 13 feet below ground surface (BGS). Ground water was encountered at 12 feet BGS. The four soil and four water samples all contained less than detectable amounts of WTPH-Diesel (<25 mg/Kg for soil and <0.5 mg/l for water). Based on these data the consultant, Mr. Ross Stainsby at AGI-Technologies, concluded that contamination was isolated and limited in extent.

In July 1994 approximately 100 cubic yards of contaminated soil was excavated from the UST area, and transported to the city waste water treatment plant for land farming. Extent of excavation was based on field monitoring using an organic vapor meter equipped with a photoionization detector. Also, 1,500 gallons of ground water was pumped from the area of contamination and disposed of off site. One soil sample was collected from the excavation sidewall (exact location not identified), and one ground water sample was collected following the above referenced pumping. Resulting data showed 31 ppm (or mg/Kg) WTPH-Diesel in the soil and 0.62 ppm (or mg/l) in the water, both below the Method A cleanup levels of 200 mg/Kg and 1 mg/l respectively.

Based on these findings the AGI-Technologies representative advised the city that the excavation and sump could be closed.

Samples collected from the land farmed soils on October 3, 1996 contained residual WTPH-Diesel at 86-130 mg/Kg (below the 200 mg/Kg cleanup level). Mr. Rick Funderburk, of White Shield Environmental, advised the City that the soil would be considered "Class 2" and could be used for such purposes as fill in commercial or industrial areas, landfill cover, etc.

IV. Discussion

While all data provided points toward a clean closure, it would have been more conclusive if all four excavation sidewalls had been sampled rather than just one. Also, collecting the ground water sample immediately following pumping of 1,500 gallons may have biased the water data low.

However, those concerns may be offset by the prior data obtained from the test pits which indicate limited extent of contamination.

V. Conclusion

Based on the above findings, I believe it is appropriate that this LUST site be given a **non-clean closure**, and that no further action be required. The standard qualification that **"any future migration of contamination may warrant further investigation and remediation by the owner/operator"** should be included in the closure letter.

Recommended: John E Osborn — John Osborn, Environmental Engineer — 7/9/97 Date

Concur: Harold Scott — Harold Scott, Environmental Engineer — 12/10/97 Date

Approved: Lauris Davies — Lauris Davies, UST Program Manager — 2/26/98 Date